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September 19, 2024

**VIA ECF**

The Honorable Renée Marie Bumb  
United States District Court  
Mitchell H. Cohen Building and U.S. Courthouse  
Courtroom 3D  
4th & Cooper Streets  
Camden, NJ 08101

Re: *In re Valsartan, Losartan, and Irbesartan Liability Litigation*,  
Case No. 1:19-md-02875-RMB (D.N.J.)

Dear Chief Judge Bumb:

I write on behalf of the TPP Trial Defendants (“Defendants”) with respect to the date for Defendants’ submission of a response to the TPP Trial Plaintiffs’ Brief Regarding Trial Claims, Damages and MIL 16 (ECF No. [2844](#)). Consistent with the Court’s direction at yesterday’s hearing, Defendants have reviewed Plaintiffs’ brief and ask the Court to allow them until Tuesday, September 24, 2024, to file a response given the need to address: (1) the authorities included in the 18-page case law appendix submitted by Plaintiffs along with their brief; and (2) Plaintiffs’ unanticipated arguments and appendices regarding issues related to scienter and the reliability of IQVIA data.

Defendants have conferred with Plaintiffs on this issue. Plaintiffs do not oppose Defendants’ request to submit their response brief on Tuesday, September 24.

Thank you for your consideration.

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Respectfully,



Nina R. Rose

cc: All counsel of record (via ECF)